LAW OFFICES OF

GERALD B. LEFCOURT, P.C.

A PROFESSIONAL CORPORATION

148 EAST 78TH STREET
NEW YORK, NEW YORK 10075

GERALD B. LEFCOURT lefcourt@lefcourtlaw.com

TELEPHONE (212) 737-0400 FACSIMILE (212) 988-6192

SHERYL E. REICH
reich@lefcourtlaw.com
RENATO C. STABILE
stabile@lefcourtlaw.com
FAITH A. FRIEDMAN
ffriedman@lefcourtlaw.com

November 20, 2014

VIA ECF

The Honorable Loretta A. Preska Chief Judge United States District Court Southern District of New York United States Courthouse 500 Pearl St. New York, NY 10007-1312

Cohen v. Cohen, 09 CIV 10230 (LAP)

Dear Judge Preska:

We write to memorialize the dates by which various actions are to be taken in light of the Court's extension of discovery at the November 17, 2014, conference in this matter. The revised dates are the dates for each of the actions set forth in this Court's Order filed May 21, 2014 [Dkt. No. 126], to which 51 days were added (the number of days from December 12, 2014, to January 31, 2015).

- 1. Fact discovery shall be completed by January 31, 2015.
- 2. Expert reports shall be served by March 3, 2015.
- 3. Rebuttal expert reports, if any, shall be served by April 3, 2015.
- 4. Expert depositions shall be completed by April 25, 2015.
- 5. Any dispositive motions shall be filed by May 20, 2015. Papers in opposition thereto shall be filed by June 20, 2015, or one month after the dispositive motion is filed. Reply papers shall be filed July 10, 2015, or three weeks after opposition papers filed.
- 6. The parties shall file a joint pretrial order within thirty (30) days of a decision on any dispositive motion, if necessary. If no dispositive motions are filed, the parties shall file a joint pretrial order by June 18, 2015.

GERALD B. LEFCOURT, P.C.

Hon. Loretta A. Preska, Chief Judge United States District Court Southern District of New York November 20, 2014 Page 2

Thank you for your consideration in this matter.

Respectfully submitted,

/s/

Gerald B. Lefcourt